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October 18, 2024

**VIA CM/ECF**

Hon. Indira Talwani  
 United States District Judge  
 United States District Court for the District of Massachusetts  
 John Joseph Moakley United States Courthouse  
 1 Courthouse Way  
 Boston, MA 02210

Re: *Servicios Funerarios GG, S.A. De C.V., v. Advent International Corporation*,  
 Case No.: 23-cv-10684, Proposed Schedule

Dear Judge Talwani:

We write on behalf of Plaintiff and Counterclaim-Defendant Servicios Funerarios GG, S.A. De C.V. ("SF") in advance of this morning's case management conference. The parties have met and conferred, and as a result, have narrowed the issues before the Court this morning. However, the parties continue to disagree about the appropriate intervals between events. Further, after our meet-and-confer yesterday, the Defendant filed a motion to yet again extend the protective order preventing the depositions of two key witnesses until December 31. While Plaintiffs will strenuously object to this motion, the motion shows why the SF believes the Court should not allow further delay of this action. It is for this reason, among the other delay tactics put forth by Defendants, that Plaintiffs request a firm trial date be set at today's hearing.

For the Court's convenience, SF's proposed schedule is below:

	<b><u>Current</u></b>	<b><u>SF Proposal</u></b>
<b>1<sup>st</sup> 5 Depos</b>	9/24	1/17
<b>Close of Fact Discovery</b>	10/29	1/31
<b>P/CP Expert Reports</b>	11/18	2/14
<b>Identify D/CD Experts</b>		2/21
<b>D/CD Expert Reports</b>	12/2	2/28
<b>Dispositive Motions</b>	12/6	3/7
<b>Expert Depos</b>	1/31	3/21
<b>Daubert Motions</b>	2/28	4/4
<b>Opp to Daubert</b>	3/28	4/18
<b>Trial Date*</b>		5/2

\*On or about this date, subject to the parties' and the Court's availability.



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Very truly yours,

*/s/ Carlos M. Sires*

Carlos M. Sires

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